

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE JOINT LIST OF
DOCKET ENTRIES BY DOCKET NUMBER THAT PARTIES AGREE SHOULD
BE UNSEALED AND SUPPORTING BASIS FOR CONTINUED SEALING**

The defendant, Dzhokhar Tsarnaev, by and through counsel, and the United States, by and through counsel, respectfully request an extension of time up to and including January 22, 2016 in order to comply with the Court's Scheduling Order applicable to all docket entries currently under seal. [*See* DE 1605].

On December 1, 2016, the Court provided both the Government and the Defendant copies of all documents which the parties filed either *ex parte* or under seal. Neither party was provided with copies of the other party's sealed or *ex parte* documents. The productions were by way of compilations of bookmarked pdf files. The parties have now conferred and believe it will be necessary to exchange copies of their non *ex parte* but sealed documents along with an initial recommendation regarding unsealing. The parties jointly request an additional 30 days to complete the extraction and organization of their documents, to exchange the documents which were sealed but not *ex parte*, and to review, meet and confer regarding their joint recommendations and/or separate positions regarding continued sealing or unsealing.

The extension, to and including January 22, 2016, is necessary given the joint work that is necessary to comply with the Court's directive, out of town holiday/family commitments, and ongoing workload.

CONCLUSION

For the foregoing reasons, the United States and the Defendant request an extension to and including January 22, 2016 to comply with the Court's Scheduling Order, DE 1605.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ William Weinreb
William D. Weinreb
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DZHOKHAR TSARNAEV
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/s/ Judy Clarke
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Judy Clarke